



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 19, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)

Dear Judge Nathan:

The Government, with consent of defense counsel, respectfully requests that the Court allow the parties to arrange for the provision of secure high-speed wired Internet access in the courtroom in connection with trial in the above-captioned matter. The secure Internet connection will enable the trial teams in the courtroom to stay connected to their online case repositories and resources during critical moments of the proceedings. This will facilitate the effective and efficient presentation of evidence. In addition, the parties will be able to reduce the files they bring into the courtroom, as well as the traffic to and from the courtroom during proceedings. Although the parties understand that the courtroom also has Wi-Fi access, which is available for use, a high-speed wired connection ensures a faster internet connection and will avoid connectivity issues.

Subject to the Court's approval, the parties will retain Courtroom Connect to provide these services. Courtroom Connect does not require any court resources to provide service and currently maintains a network in the courthouse that is 100% independent of the Court's internal network. Set up, installation and service fees will be paid for by the parties at no cost to the Court.

Other trials in federal courts have utilized a high-speed connection to the Internet in the courtroom, including *United States v. Gatto*, 17 Cr. 686 (LAK). The following describes how Courtroom Connect restricts access to the network and ensures compliance with court security and directives:

- The network will be a hard-wired, secure physical network connection utilizing a firewall and other security provisions.

- Onsite support, maintenance and other measures are provided to ensure the highest levels of security and reliability.
- The network is totally separate from the court's internal network; it is therefore physically impossible for information on the court's existing systems to be accessed or compromised.

Courtroom Connect will make all necessary arrangements with the Court's District Executive office and computer networking personnel.

If the Court is agreeable to these arrangements, the Government respectfully requests that the Court enter the enclosed proposed order permitting the parties to proceed.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: _____s/
Maurene Comey
Alison Moe
Lara Pomerantz
Andrew Rohrbach
Assistant United States Attorneys
Southern District of New York

Cc: Defense Counsel (By ECF)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v.- : 20 Cr. 330 (AJN)

GHISLAINE MAXWELL, :

Defendant. :

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IT IS HEREBY ORDERED THAT Courtroom Connect, a Southern District of New York contracted vendor, may provide the parties in the *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (AJN), with an Internet connectivity feed for the duration of the trial proceedings, set to begin on Monday, November 29, 2021. Courtroom Connect should make proper arrangements with the District Executive Office of the Court and the official court reporter.

SO ORDERED:

Dated: November __, 2021
New York, New York

HONORABLE ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE